

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

MILLENIUM INSTITUTE FOR ANC  
INC

Debtor


CASE NO. 12-02689 BKT

CHAPTER 11

MOTION REQUESTING APPROVAL OF STIPULATION BY AND BETWEEN  
THE STATE INSURANCE FUND CORPORATION AND THE DEBTOR

TO THE HONORABLE COURT:

COMES NOW, The State Insurance Fund Corporation represented by its attorney Wally De La Rosa Vidal and the debtor The Millenium Institute for ANC Inc by its attorney Gloria M Justiniano Irizarry, who respectfully stipulate as follows:



1. That the debtor is properly represented by its attorney herein attorney Isabel M Fullana, who respectfully stipulate as follows, with the SIF represented by attorney Wally de la Rosa Vidal:

a. That on December 8, 2015 the SIF did filed a motion under 11 U.S.C. 503 (B) (1) (A) in the amount of \$13,084.44 for year 2015 related to insurance policy #0212000417, see Docket 313.

b. That Docket 313 was granted by the Honorable Court on January 5, 2016, see Docket 326.

c. That the SIF and the debtor have been sustaining conversations related to the indebtedness of insurance policy 0212000417, year 2016 granted by the Honorable Court in Docket 326, in the amount of \$13,084.44.

d. That the indebtedness of the debtor to the SIF on this date is the amount of \$8,084.44 and not the \$13,084.44, see exhibit 1 for year 2015 and the insurance policy for year 2016 has been paid by the debtor and is covered by a proper insurance policy for year 2016.

e. That the SIF and the debtor have agreed to a Payment Plan of the \$8,084.44 to be paid in three years (for year 2015), 36 monthly payments in the amount of \$224.56 for 35 month and a final payment on the 36 month of \$224.84.

f. That a first payment is received upon the filling of the present stipulation and on the 10<sup>th</sup> day of each subsequent month up and until full payment.

g. That the incompliance with the payment of two succeeding monthly payment will give the right to the SIF declare a noncompliance of the debtor as to the balance indebted in said moment and proceed to the collection of the totality of the indebtedness that may exist in said moment.

The Honorable Court will reserve its jurisdictional power in order to entertain and resolve the present stipulation Docket 313 and 336 § D118; the organization plan; page 16, article IX, The retention of Jurisdiction.

That the parties move the Honorable Court to enter an order approving the present stipulation.

**WHEREFORE**, the appearing parties respectfully request the entry of an order approving the stipulation, as well as any other remedy this Honorable Court may deem proper.

# CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed this document through the CM/ECF system, which will send notification of such filing to the debtor through his attorney, Isabel M Fullana, Esq., Monsita Lecaroz Arribas, Esq., Office of the U.S. Trustee; and to all participants of CM/ECF. Also a true copy was sent by U.S. regular mail, postage prepaid, to all non- CM/ECF participants.

In San Juan, Puerto Rico, May 09, 2016.

RESPECTFULLY SUBMITTED.

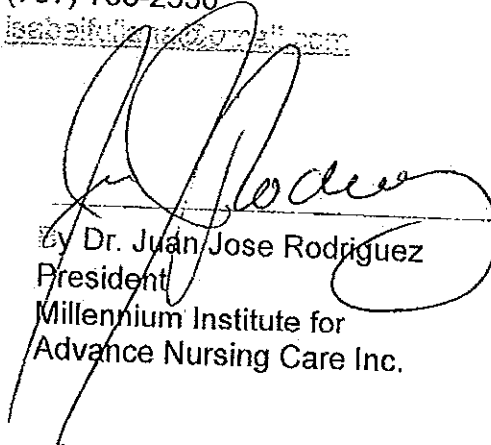
  
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